

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DAKOTA GARDNER

**4 : CR 16- 136**

: CRIMINAL NO.

:

: VIO: 21 : U.S.C. §§871;

:

115(a)(1)

:

: *Judge Mariani*

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Threats Against the President  
18 U.S.C. § 871

FILED  
WILLIAMSPORT  
MAY 26 2016  
PER *[Signature]*  
DEPUTY CLERK

On or about September 18, 2015, at the United States Penitentiary,  
Allenwood Federal Correctional Complex, in White Deer, Union County,  
Pennsylvania, a place within the special maritime and territorial  
jurisdiction of the United States, and within the Middle District of  
Pennsylvania, the defendant,

DAKOTA GARDNER,

an inmate at said correctional facility, did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon, the President of the United States. All in violation of Title 18, United States Code, Section 871(a).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT TWO**  
**Threatening a Federal Official**  
**18 U.S.C. § 115(a)(1)(B)**

On or about the September 18, 2015, at the United States Penitentiary, Allenwood Federal Correctional Complex, in White Deer, Union County, Pennsylvania, a place within the special maritime and territorial jurisdiction of the United States, and within the Middle District of Pennsylvania, the defendant,

**DAKOTA GARDNER,**

an inmate at said correctional facility, did knowingly and intentionally threaten to torture and murder C.N., an Assistant United States Attorney with intent to impede, intimidate, and interfere with C.N. while engaged in the performance of her official duties, and with intent

to retaliate against C.N. on account of the performance of her official duties. All in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT THREE**  
**Threatening the Family of a Federal Official**  
**18 U.S.C. § 115(a)(1)(A)**

On or about the September 18, 2015, at the United States Penitentiary, Allenwood Federal Correctional Complex, in White Deer, Union County, Pennsylvania, a place within the special maritime and territorial jurisdiction of the United States, and within the Middle District of Pennsylvania, the defendant,

DAKOTA GARDNER,

an inmate at said correctional facility, did knowingly threaten to murder the family of C.N., an Assistant United States Attorney with intent to impede, intimidate, and interfere with C.N. while engaged in the performance of her official duties, and with intent to retaliate against C.N. on account of the performance of her official duties. All in violation of Title 18, United States Code, Section 115(a)(1)(A) and (b)(4).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT FOUR**  
**Threats Against the President**  
**18 U.S.C. § 871**

On or about March 29, 2016, at the United States Penitentiary, Allenwood Federal Correctional Complex, in White Deer, Union County, Pennsylvania, a place within the special maritime and territorial jurisdiction of the United States, and within the Middle District of Pennsylvania, the defendant,

DAKOTA GARDNER,

an inmate at said correctional facility, did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon, the President of the United States. All in violation of Title 18, United States Code, Section 871(a).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT FIVE**  
**Threatening a Federal Official**  
**18 U.S.C. § 115(a)(1)(B)**

On or about the March 29, 2016 at the United States Penitentiary, Allenwood Federal Correctional Complex, in White Deer, Union County, Pennsylvania, a place within the special maritime and territorial jurisdiction of the United States, and within the Middle District of Pennsylvania, the defendant,

DAKOTA GARDNER,

an inmate at said correctional facility, did knowingly and intentionally threaten to torture and kidnap and murder C.N., an Assistant United States Attorney with intent to impede, intimidate, and interfere with C.N. while engaged in the performance of her official duties, and with intent to retaliate against C.N. on account of the performance of her official duties. All in violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).



**THE GRAND JURY FURTHER CHARGES:**

**COUNT SIX**

**Threatening the Family of a Federal Official  
18 U.S.C. § 115(a)(1)(A)**

On or about the March 29, 2016, at the United States Penitentiary, Allenwood Federal Correctional Complex, in White Deer, Union County, Pennsylvania, a place within the special maritime and territorial jurisdiction of the United States, and within the Middle District of Pennsylvania, the defendant,

DAKOTA GARDNER,

an inmate at said correctional facility, did knowingly threaten to kidnap, murder, and torture the family of C.N., an Assistant United States Attorney with intent to impede, intimidate, and interfere with C.N. while engaged in the performance of her official duties, and with intent to retaliate against C.N. on account of the performance of her official

duties. All in violation of Title 18, United States Code, Section 115(a)(1)(A) and (b)(4).

A TRUE BILL